Patent

#### REMARKS

Claims 3-6, 9-18, 41-45 and 48-50 remain pending in the present application.

Applicants appreciate the indication that claims 3-6 are allowed.

Claims 7 and 8 have been cancelled herein without prejudice to prosecuting these claims in a continuing application. Claims 5, 10, 13, and 14 have been amended in an editorial manner and not in response to the art or any formal requirement. Claims 41 and 42 have been amended to direct their scope to alternative aspects of the invention.

The title of the invention has been amended herein generally as suggested by the Examiner. No limitations should be read into the claims in view of the title change. A supplemental application data sheet accompanies this Amendment with the amended title.

The primary purpose of this Amendment is to clarify - a final time - applicants' position regarding the Office's now-familiar rejections. These clarifications pave the path for an appeal.

Claims 9-16, 41-45 and 48-50 stand rejected under U.S. Patent No. 6,504,571 as being anticipated by the now-familiar Narayanaswami (U.S. Patent No. 6,504,571). Applicants respectfully traverse these rejections.

# Claim 9

The Examiner cites passages in cols. 3 and 4 as teaching the combination as recited in claim 9. Applicants respectfully disagree.

In particular, while lines 32-41 of col. 4, may discuss map generation, the passage is not understood to piece together image blocks based on encoded location indicators. In fact, the "generating" cited by the Examiner seems to "retrieve" images, but not piece them together based on encoded location indicators. The retrieved images are then displayed, e.g., as discussed at Col. 4, line 42.

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#### Claim 15

The Examiner suggests that similar analysis as used for claim 9, above, should be applied to claim 15. Applicants respectfully disagree. In fact, claim 15 recites modifying imagery data based on embedded imagery characteristics so as to standardize at least some of the imagery data. Applicants have again studied the passages cited by the Examiner in col. 3 and 4, and again do not understand them to teach modifying based on embedded characteristics so as to standardize. The cited passages seem to retrieve images for display, but not modify them based on embedded characteristics so as to standardize in a manner recited by claim 15.

## Claim 41

Claim 41 has been amended to clarify that a map depicts at least a first region and a second region. A watermark including geolocation information corresponding to the first region is embedded only in the first region.

Narayanaswami does not discuss such a combination of features.

# Claims 45 and 50

We respectfully disagree with the Examiner's interpretation of Narayanaswami as applied to claims 45 and 50. The Examiner argues that "piccing together comprises a first geolocation/geovector data that becomes embedded/watermarked. As this first geolocation/geovector data that becomes embedded/watermarked pieced together, the watermarking thus becomes redundant" (see page 6, lines 1-4).

But even if we assume - only for argument's sake - that Narayanaswami pieces together different images, as suggested by the Examiner, the different images would presumable have different geovector (or geolocation) information therein, not redundant instances of the first geovector (or geologation) information as recited in claims 45 and 50.

The office seems to concede this position, on page 5 of the Office Action (lines 16-17), where it states: "Further, the reference does not disclose watermarking a single set of parameters more than once."

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(Applicants reiterate that, as discussed above with respect to claim 9, Narayanaswami is not understood to teach or suggest piece together image blocks based on encoded location indicators.).

## Claim 48

(On page 12, paragraph 21, the Office Action refers applicants to section 3 for a further response to applicants' previous remarks. However, the Office seems to have inadvertently omitted a response with respect to claim 48 in section 3.).

The Office cites Column 8, lines 6-21 and 40-62, and Column 7, lines 25-46 as teaching the combination recited in claim 48. Applicants respectfully disagree.

While the cited passages discuss embedding different parameters (e.g., location and axis orientation) in each image, it is not understood to embed multiple location parameters - which correspond to different regions depicted in the same image - in the same image. More precisely, the cited passages are not understood to teach or suggest embedding first geolocation information in a first region of an image, and second geolocation information in the same image. Indeed, Nurayanaswami at the cited col. 7 and 8 passages seems to only embed one geolocation information per image (e.g., see Col. 7, lines 25-30), not multiple different geolocation information per image.

### Dependent claims

The dependent claims recite many patentable combinations in their own right. Favorable consideration is requested.

(Applicants expressly object to the proposed combination of references with respect to claim 17. Moreover, applicants respectfully request clarification as to why the Office deems Wang to be relevant to claim 17, so that the Office's position can be clearly addressed on appeal, if needed.)

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# Conclusion

The application is in condition for allowance. An early notice of allowance is requested.

Nevertheless, the Examiner is invited to telephone the undersigned at 503-495-4575 with any questions.

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Respectfully submitted,

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